

SPECTRUM BIOBANK PRIVACY POLICY

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Welcome to the website (the “**Site**”) of Spectrum Biobank (“**Spectrum Biobank**,” “**we**,” “**us**,” or “**our**”). Spectrum Biobank provides DNA research and practical understanding with a mission to increase diversity in genomics (collectively, including the Site, the “**Service**”).

This Privacy Policy explains what personal information we collect, how we use and share that information, and your choices concerning our information practices.

Before using the Service or submitting any personal information to Spectrum Biobank, please review this Privacy Policy carefully and [contact us](#) if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy, please do not access the Site or otherwise use the Service.

1. PERSONAL INFORMATION COLLECTION

We collect personal information as follows:

Personal Information You Provide: We collect the following categories of personal information from you when you purchase our Services or create a Spectrum Biobank account:

- **Identification Information:** We may collect your name, email address, phone number, mailing/billing addresses, and government identification documents (i.e., your driver’s license, passport, or state identification card).
- **Financial Information:** Our payment processor(s) will collect the financial information necessary to process your payments, such as your payment card number and authentication details. Please note, however, that we store only a tokenized version of such information and do not maintain payment card information on our servers.
- **Demographic Information:** We may collect your age, gender, or income level.
- **Self-Reported Information:** You have the option to provide us with additional information about yourself through surveys, forms, features, and applications. For example, you may provide us with information about your personal traits, ethnicity, disease conditions, other health-related information, and family history information. Before you disclose information about a family member, you should make sure you have permission from the family member to do so.
- **Communication Information:** We may collect information when you contact us with questions or concerns and when you voluntarily respond to questionnaires, surveys or requests for market research seeking your opinion and feedback. Providing communication information is optional to you.
- **Commercial Information:** We may retain a history of the products you browse and/or purchase using the Service.
- **Social Media Information:** We have pages on social media sites like Facebook (“**Social Media Pages**”). When you interact with our Social Media Pages, we will collect personal information that you elect to provide to us, such as your contact details. In addition, the companies that host our Social Media Pages may provide us with aggregate information and analytics regarding the use of our Social Media Pages.

Information Related to our Genetic Testing Services: We collect the following types of information when you interact with our Services:

- **Saliva sample and biobanking:** To use our genetic testing services, you must purchase, or receive as a gift, a Spectrum Biobank testing kit, create an online account and register your kit, and ship your saliva sample to us or our [third party] laboratory. Your DNA will be extracted from your saliva sample for analysis. During kit registration you are asked to review our [Consent Document for Sample Storage and Additional Genetic Analyses]. [You can update your Biobanking preference to discard a stored sample within your Spectrum Biobank Account Settings once your sample has completed processing.]
- **Genetic Information:** Information regarding your genotype (e.g. the As, Ts, Cs, and Gs at particular locations in your genome) is generated when we analyze and process your saliva sample, or when you otherwise contribute or access your Genetic Information through our Services. Genetic Information includes the Spectrum Biobank results reported to you as part of our Services such as ancestry estimates.

Internet Activity Information: When you visit, use, and interact with the Service, the following information may be created and automatically logged in our systems:

- **Device Information:** The manufacturer and model of the device, operating system, IP address, unique identifiers, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Information:** Information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency, and duration of your activities.
- **Location Information:** We may derive a rough estimate of your location from your IP address when you visit the Site.
- **Analytics:** We use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics helps us analyze how users use the Site and enhance your experience when you use the Site. For more information on how Google uses this information, click [here](#).
- **Email Open/Click Information:** We may use pixels in our email campaigns that allow us to collect your email and IP address as well as the date and time you open an email or click on any links in the email.

The following technologies may be used to collect Internet Activity Information:

- **Cookies**, which are text files stored on your device to uniquely identify your browser or to store information or settings in the browser to help you navigate between pages efficiently, remember your preferences, enable functionality, help us understand user activity and patterns, and facilitate online advertising.
- **Local storage technologies**, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
- **Web beacons**, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

2. PERSONAL INFORMATION USE

We use your personal information for:

Service Delivery, including to:

- Provide, operate, maintain, secure and improve the Service, including by creating new features;
- Process, analyze, and deliver your genetic testing results;
- Conduct surveys or polls, and obtain testimonials;
- Create, maintain, and authenticate your account;
- Process transactions through our third party payment processors;
- Communicate with you about administrative matters such as updates to our terms or policies; and
- Provide support and respond to your requests, questions and feedback.

Research and Development: Following your submission of a test kit and/or survey responses, with your consent, we or our third party research partners may analyze anonymized and aggregated genetic data and/or survey responses. We will also use your personal information to contact you about research opportunities. With your consent, we may permit researchers to contact you for research purposes.

Marketing and Advertising: We and our advertising partners may use your Identification Information, Self-Reported Information, and Internet Activity Information for marketing and advertising purposes, including:

- **Direct Marketing:** To send you direct marketing communications as permitted by law, including, but not limited to, notifying you of special promotions, offers and events via postal mail, email, telephone, text message, and other means.
- **Interest-Based Advertising:** We engage advertising partners, including third party advertising companies and social media companies, to display ads on the Service and other online services. These companies may use cookies and similar technologies to collect information about your interaction over time across the Service, our communications, and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the [Limit Online Tracking](#) section below.

Compliance and Protection, including to:

- Comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;

- Protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- Audit our internal processes for compliance with legal and contractual requirements and internal policies; and
- Prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

3. PERSONAL INFORMATION SHARING

Our Sharing: In certain circumstances we may share the categories of personal information described above without further notice to you, unless required by the law, with the following categories of third parties:

- **Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share personal information with service providers, including providers of hosting services, cloud services, and other information technology services providers, email communication software and email newsletter services, advertising and marketing services, payment processors, customer relationship management and customer support services, and analytics services. Pursuant to our instructions, these parties will access, process, or store personal information in the course of performing their duties to us.
- **Professional Advisors:** We may share personal information with professional advisors such as lawyers and accountants where doing so is necessary to facilitate the services they render to us.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, dissolution, sale of all or a portion of our assets, or transition of service to another provider (collectively a "Transaction"), your personal information may be shared in the diligence process with counterparties and others assisting with the Transaction and transferred to a successor or affiliate as part of or following that Transaction along with other assets.
- **Legal Requirements:** We may disclose your Personal Information where required to do so for the Compliance and Protection purposes described above.
- **Affiliates:** We may share personal information with our future affiliates, meaning an entity that controls, is controlled by, or is under common control with Spectrum Biobank. Our affiliates may use the personal information we share in a manner consistent with this Privacy Policy.

Your Sharing: Through the Service, you may be able to make your personal information available to others, including:

- **Other users and the public,** when you create a public profile, post content, and engage in public transactions through the Service;
- **Other businesses,** when you participate in offers, promotions and other features available via the Service or marketed to you; and
- **Social media platforms,** when you choose to share content on social media.

4. CHILDREN

Our Service is not directed to children who are under the age of 18. Spectrum Biobank does not knowingly collect personal information from children under the age of 18. If you have reason to believe that a child under the age of 18 has provided personal information to Spectrum Biobank through the Service please [contact us](#) and we will try to delete that information from our databases.

5. LINKS TO OTHER WEBSITES

The Service may contain links to other websites not operated or controlled by Spectrum Biobank, including social media services (“**Third Party Sites**”). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed these sites. Please contact the Third Party Sites directly for information on their privacy practices and policies.

6. SECURITY

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information. You use the Service at your own risk.

7. PERSONAL INFORMATION PROCESSING IN THE U.S.

Spectrum Biobank is headquartered in the United States. By using our Service, you understand and acknowledge that your personal information will be transferred from your location to our facilities and servers in the United States, where data protection laws may be less protective than those in your jurisdiction.

8. YOUR CHOICES

Update or Correct Personal Information: To keep your information accurate, current, and complete, please [contact us](#) as specified below. We will take reasonable steps to update or correct your personal information in our possession.

Opt-Out of Marketing Communications: You may opt out marketing-related communications by following the opt out or unsubscribe instructions contained in the marketing communication we send you. Please note, however, that if you do so you may continue to receive communications for Service Delivery purposes.

Limit Online Tracking: There are a number of ways to limit online tracking, which we have summarized below:

- **Block Cookies:** Most browsers let you remove or reject cookies, including cookies used for interest-based advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Use the following links to learn more about how to control cookies and online tracking through your browser:
 - [Firefox](#); [Chrome](#); [Microsoft Edge](#); [Safari](#)

- **Limit the Use of Advertising ID:** Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.
- **Use Privacy Plug-Ins or Browsers:** You can block our Services from setting cookies used for interest-based ads by using a browser with privacy features, like [Brave](#), or installing browser plugins like [Privacy Badger](#), [DuckDuckGo](#), [Ghostery](#) or [uBlock Origin](#), and configuring them to block third party cookies trackers. You can also install a browser add-on to opt out of [Google Analytics](#).
- **Advertising Industry Opt-Outs:** You can also use these opt-out options to limit use of your information for interest-based advertising by participating companies:
 - [Digital Advertising Alliance](#)
 - [Network Advertising Initiative](#)
- **Platform Opt-Outs.** The following advertising platforms offer opt-out features that let you opt out of use of your information for interest-based advertising:
 - Google [opt-out](#)
 - LinkedIn [opt-out](#)
 - Microsoft [opt-out](#)
 - Pinterest [opt-out](#)

Note that the above opt-out mechanisms are specific to the device or browser on which they are exercised. You will need to opt out on every browser and device that you use.

Do Not Track. Some browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. Learn more about "Do Not Track" [here](#).

9. CHANGES TO THE PRIVACY POLICY

The Service and our business may change from time to time. As a result we may change this Privacy Policy at any time. When we do we will post an updated version on this page, unless another type of notice is required by the applicable law. By continuing to use our Service or providing us with personal information after we have posted an updated Privacy Policy, or notified you by other means if applicable, you consent to the revised Privacy Policy and practices described in it.

10. CONTACT US

If you have any questions about our Privacy Policy or information practices, please feel free to contact us at our designated request address: privacy@spectrumbiobank.org